

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

United States Courts
Southern District of Texas
FILED

January 08, 2025

Nathan Ochsner, Clerk of Court

UNITED STATES OF AMERICA,

v.

ALFRED JACOBY GREEN,
a/k/a "Coby,"

KELVIN GEORADE JACKSON,

DEANDRE MARQUEL FIZER,
a/k/a "Dre,"

JONATHAN ROSS SIUM,

ALEXUS MONIQUE HATCHETT,

SHAWANDA JOHNSON-SMITH,

JESSICA FERGUSON,

ELBERT JACKSON,

TRAMAINA LAVON BATISTE,

and

DENZEL CURTIS DWAYNE PINK,

Defendants.

CASE NO. 4:24-CR-00404

JUDGE HANEN

INDICTMENT

18 U.S.C. § 2

18 U.S.C. § 922(g)

18 U.S.C. § 924(c)(1)(A)

21 U.S.C. § 841(a)(1)

21 U.S.C. § 841(b)(1)(A)(ii)

21 U.S.C. § 841(b)(1)(B)(ii)

21 U.S.C. § 841(b)(1)(B)(viii)

21 U.S.C. § 841(b)(1)(C)

21 U.S.C. § 846

FORFEITURE

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE
Title 21, United States Code, Section 846

Conspiracy to Possess with Intent to Distribute and Distribute a Controlled Substance

Beginning no later than in or about March 2023, the exact date being unknown, and continuing up to and including August 28, 2024, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendants,

**ALFRED JACOBY GREEN,
a/k/a "Coby,"**

KELVIN GEORADE JACKSON,

**DEANDRE MARQUEL FIZER,
a/k/a "Dre,"**

JONATHAN ROSS SIUM,

ALEXUS MONIQUE HATCHETT,

SHAWANDA JOHNSON-SMITH,

JESSICA FERGUSON,

ELBERT JACKSON,

TRAMAINA LAVON BATISTE,

and

DENZEL CURTIS DWAYNE PINK,

did knowingly and intentionally conspire and agree with each other, and others known and unknown to the Grand Jury, to possess with intent to distribute and distribute a mixture and substance containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of isomers, a Schedule II controlled substance,

All in violation of Title 21, United States Code, Sections 846 and 841(a)(1).

QUANTITY ATTRIBUTIONS

Defendants, **ALFRED JACOBY GREEN, a/k/a “Coby,” KELVIN GEORADE JACKSON, DEANDRE MARQUEL FIZER, a/k/a “Dre,” ALEXUS MONIQUE HATCHETT, JONATHAN ROSS SIUM, SHAWANDA JOHNSON-SMITH, and JESSICA FERGUSON**, knew from their own conduct as members of the conspiracy charged in Count One and from the readily foreseeable conduct of other members of that conspiracy that the conspiracy involved a quantity of at least 5 kilograms of a mixture and substance containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(ii).

Defendants **ELBERT JACKSON** and **DENZEL CURTIS DWAYNE PINK**, knew from their own conduct as members of the conspiracy charged in Count One and from the readily foreseeable conduct of the other members of that conspiracy that the conspiracy involved a quantity of at least 500 grams of a mixture and substance containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of isomers Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(ii).

Defendant, **TRAMAIN LAVON BATISTE**, knew from his own conduct as a member of the conspiracy charged in Count One and from the readily foreseeable conduct of other members of that conspiracy that the conspiracy involved a quantity of cocaine, its salts, optical and geometric isomers, and salts of isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

All in violation of Title 21, United States Code, Section 846.

COUNT TWO
Title 21, United States Code, Section 841(a)(1)
Possession with Intent to Distribute a Controlled Substance

On or about March 29, 2024, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendants, **DEANDRE MARQUEL FIZER, a/k/a “Dre,”** and **ALEXUS MONIQUE HATCHETT**, aided and abetted by one another, did knowingly and intentionally possess with intent to distribute at least 5 kilograms of a mixture and substance containing a detectable amount of cocaine, its salts, isomers and salts of its isomers, a Schedule II controlled substance,

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(ii), and Title 18, United States Code, Section 2.

COUNT THREE
Title 18, United States Code, Section 922(g)(1)
Possession of a Firearm by a Convicted Felon

On or about March 29, 2024, in the Southern District of Texas, defendant, **DEANDRE MARQUEL FIZER, a/k/a “Dre,”** knowing that he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess at least one firearm, to wit, a loaded Glock 17 9mm pistol, bearing serial number BEYA797, and said firearm having been shipped and transported in interstate and foreign commerce,

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT FOUR
Title 18, United States Code, Section 924(c)
Possession of a Firearm in Furtherance of a Drug Trafficking Crime

On or about March 29, 2024, in the Southern District of Texas, defendant, **DEANDRE MARQUEL FIZER, a/k/a “Dre,”** did knowingly possess at least one firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, namely knowingly and intentionally possessing with intent to distribute a controlled substance, in violation of 21 U.S.C. § 841(a)(1), as charged in Count Two of this indictment.

All in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT FIVE
Title 21, United States Code, Section 841(a)(1)
Possession with Intent to Distribute a Controlled Substance

On or about April 10, 2024, in the Southern District of Texas, defendants, **ALFRED JACOBY GREEN a/k/a “Coby”** and **ELBERT JACKSON**, aided and abetted by one another, did knowingly and intentionally possess with intent to distribute and did distribute a quantity of cocaine, its salts, isomers and salts of its isomers, a Schedule II controlled substance,

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT SIX

Title 18, United States Code, Section 922(g)(1)
Possession of a Firearm by a Convicted Felon

On or about April 10, 2024, in the Southern District of Texas, defendant, **ALFRED JACOBY GREEN a/k/a “Coby,”** knowing that he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, to wit, a .40 caliber handgun, bearing serial number X7287275, and said firearm having been shipped and transported in interstate and foreign commerce,

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT SEVEN

Title 18, United States Code, Section 922(g)(1)
Possession of a Firearm by a Convicted Felon

On or about April 10, 2024, in the Southern District of Texas, defendant, **ELBERT JACKSON**, knowing that he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, to wit, a Hi-Point, .40 caliber handgun, bearing serial number X7287275, and said firearm having been shipped and transported in interstate and foreign commerce,

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT EIGHT
Title 18, United States Code, Section 924(c)
Possession of a Firearm in Furtherance of a Drug Trafficking Crime

On or about April 10, 2024, in the Southern District of Texas, defendant, **ELBERT JACKSON**, did knowingly possess at least one firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, namely knowingly and intentionally possessing with intent to distribute a controlled substance, in violation of 21 U.S.C. § 841(a)(1), as charged in Count Five of this indictment.

All in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT NINE
Title 21, United States Code, Section 841(a)(1)
Possession with Intent to Distribute a Controlled Substance

On or about April 16, 2024 through April 17, 2024, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendants, **ALFRED JACOBY GREEN, a/k/a “Coby,” KELVIN GEORADE JACKSON, and SHAWANDA JOHNSON-SMITH**, aided and abetted by one another, did knowingly and intentionally possess with intent to distribute at least 5 kilograms of a mixture and substance containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of isomers, a Schedule II controlled substance,

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(ii), and Title 18, United States Code, Section 2.

COUNT TEN
Title 21, United States Code, Section 841(a)(1)
Possession with Intent to Distribute a Controlled Substance

On or about April 17, 2024, in the Southern District of Texas, defendant, **ALFRED JACOBY GREEN, a/k/a “Coby,”** did knowingly and intentionally possess with intent to distribute at least 500 grams of a mixture and substance containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of isomers, a Schedule II controlled substance, **All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(ii).**

COUNT ELEVEN
Title 18, United States Code, Section 924(c)(1)(A)
Possession of a Firearm in Furtherance of a Drug Trafficking Crime

On or about April 17, 2024, in the Southern District of Texas, the defendant, **ALFRED JACOBY GREEN, a/k/a “Coby,”** did knowingly possess at least one of the following firearms:

- a. Desert Eagle .50 caliber pistol, bearing serial number DK0010640,
- b. M&P Shield 9mm pistol, bearing serial number N HLL8317,
- c. JTS 12-gauge shotgun, bearing serial number MK2016913,
- d. Palmetto State Armory 556 pistol, bearing serial number 806822,
- e. Springfield Armory 1911 .45 caliber pistol, bearing serial number P197288,
- f. FN 5.7 pistol, bearing serial number 386409950,
- g. Glock 23 Gen 4 pistol, bearing serial number BHGX622,
- h. Ruger Prescott 5.7 pistol, bearing serial number 641-56433,
- i. Palmetto State Armory 556 pistol, bearing serial number 806223,
- j. Springfield Armory XDE .45 ACP pistol, bearing serial number HE109936, and
- k. Ruger LCP pistol, bearing serial number 372282232,

in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, namely knowingly and intentionally possessing with intent to distribute a controlled substance, in violation of 21 U.S.C. § 841(a)(1), as charged in Count Ten of this indictment,

All in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT TWELVE
Title 18, United States Code, Section 922(g)(1)
Possession of a Firearm by a Convicted Felon

On or about April 17, 2024, in the Southern District of Texas, defendant, **ALFRED JACOBY GREEN, a/k/a “Coby,”** knowing that he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess at least one of the following firearms, to wit:

- a. Desert Eagle .50 caliber pistol, bearing serial number DK0010640,
- b. M&P Shield 9mm pistol, bearing serial number N HLL8317,
- c. JTS 12-gauge shotgun, bearing serial number MK2016913,
- d. Palmetto State Armory 556 pistol, bearing serial number 806822,
- e. Springfield Armory 1911 .45 caliber pistol, bearing serial number P197288,
- f. FN 5.7 pistol, bearing serial number 386409950,
- g. Glock 23 Gen 4 pistol, bearing serial number BHGX622,
- h. Ruger Prescott 5.7 pistol, bearing serial number 641-56433,
- i. Palmetto State Armory 556 pistol, bearing serial number 806223,
- j. Springfield Armory XDE .45 ACP pistol, bearing serial number HE109936, and
- k. Ruger LCP pistol, bearing serial number 372282232,

and said firearms having been shipped and transported in interstate and foreign commerce,

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT THIRTEEN

Title 18, United States Code, Section 922(g)(1)
Possession of a Firearm by a Convicted Felon

On or about April 18, 2024, in the Southern District of Texas, defendant, **KELVIN GEORADE JACKSON**, knowing that he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess at least one of the following firearms, to wit:

- a. loaded Omega shotgun, bearing serial number 20AR-1272,
- b. loaded Heritage Rough Rider Revolver, bearing serial number 1BH872266,
- c. loaded FN 5.7 pistol, bearing serial number 386385221,
- d. loaded Maverick Arms Model 88, bearing serial number MV0995190,
- e. loaded MasterPiece Arms 9mm, bearing serial number FX26306, and
- f. loaded CZ Scorpion EVO 351, bearing serial number E100823,

and said firearms having been shipped and transported in interstate and foreign commerce,

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT FOURTEEN

Title 21, United States Code, Section 841(a)(1)
Possession with Intent to Distribute a Controlled Substance

On or about March 11, 2024, in the Southern District of Texas, defendants, **ALFRED JACOBY GREEN, a/k/a “Coby”** and **DENZEL CURTIS DWAYNE PINK**, aided and abetted by one another, did knowingly and intentionally possess with intent to distribute and did distribute a mixture and substance containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of isomers, a Schedule II controlled substance,

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and

Title 18, United States Code, Section 2.

COUNT FIFTEEN
Title 21, United States Code, Section 841(a)(1)
Possession with Intent to Distribute a Controlled Substance

On or about May 8, 2024, in the Southern District of Texas, defendant, **TRAMAIN** **LAVON BATISTE**, did knowingly and intentionally possess with intent to distribute at least 50 grams of a mixture and substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II controlled substance; and a mixture and substance containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of isomers, a Schedule II controlled substance,

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(viii) and (C).

COUNT SIXTEEN
Title 21, United States Code, Section 841(a)(1)
Possession with Intent to Distribute a Controlled Substance

On or about August 28, 2024, in the Southern District of Texas, defendant, **ALFRED JACOBY GREEN a/k/a “Coby,”** did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of isomers, a Schedule II controlled substance,

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C).

COUNT SEVENTEEN

Title 18, United States Code, Section 922(g)(1)
Possession of a Firearm by a Convicted Felon

On or about August 28, 2024, in the Southern District of Texas, defendant, **ALFRED JACOBY GREEN a/k/a “Coby,”** knowing that he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, to wit, a loaded Ruger handgun serial number: 371675451, and said firearm having been shipped and transported in interstate and foreign commerce,

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT EIGHTEEN

Title 18, United States Code, Section 922(g)(1)
Possession of a Firearm by a Convicted Felon

On or about August 28, 2024, in the Southern District of Texas, defendant, **KELVIN GEORADE JACKSON,** knowing that he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, to wit, a loaded Taurus .38 special revolver, serial number ADK854948, and said firearm having been shipped and transported in interstate and foreign commerce,

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT NINETEEN
Title 21, United States Code, Section 841(a)(1)
Possession with Intent to Distribute a Controlled Substance

On or about August 28, 2024, in the Southern District of Texas, defendant, **KELVIN GEORADE JACKSON**, did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of isomers, Schedule II controlled substance,

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C).

COUNT TWENTY
Title 18, United States Code, Section 924(c)(1)(A)
Possession of a Firearm in Furtherance of a Drug Trafficking Crime

On or about August 28, 2024, in the Southern District of Texas, the defendant, **KELVIN GEORADE JACKSON**, did knowingly possess a firearm, to wit, a loaded Taurus .38 special revolver, serial number ADK854948, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, namely knowingly and intentionally possessing with intent to distribute a controlled substance, in violation of 21 U.S.C. § 841(a)(1) as charged in Count Nineteen of this indictment,

All in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT TWENTY-ONE
Title 18, United States Code, Section 922(g)(1)
Possession of a Firearm by a Convicted Felon

On or about August 28, 2024, in the Southern District of Texas, defendant, **DEANDRE MARQUEL FIZER, a/k/a “Dre,”** knowing that he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess at least one of the following firearms, to wit:

- a. a loaded Glock 17, serial number BUGP151;
- b. a Glock 43x, serial number BMHX652,

and said firearms having been shipped and transported in interstate and foreign commerce,

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT TWENTY-TWO
Title 21, United States Code, Section 841(a)(1)
Possession with Intent to Distribute a Controlled Substance

On or about August 28, 2024, in the Southern District of Texas, defendant, **DEANDRE MARQUEL FIZER, a/k/a “Dre,”** did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of marihuana, a Schedule I controlled substance,

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C).

COUNT TWENTY-THREE
Title 18, United States Code, Section 924(c)
Possession of a Firearm in Furtherance of a Drug Trafficking Crime

On or about August 28, 2024, in the Southern District of Texas, defendant, **DEANDRE MARQUEL FIZER, a/k/a “Dre,”** did knowingly possess at least one of the following firearms, to wit:

- a. a loaded Glock 17, serial number BUGP151;
- b. a Glock 43x, serial number BMHX652,

in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, namely knowingly and intentionally possessing with intent to distribute a controlled substance, in violation of 21 U.S.C. § 841(a)(1) as charged in Count Twenty-Two of this indictment,

All in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT TWENTY FOUR
Title 21, United States Code, Section 841(a)(1)
Possession with Intent to Distribute a Controlled Substance

On or about August 28, 2024, in the Southern District of Texas, defendant, **DENZEL CURTIS DWAYNE PINK,** did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of isomers, a Schedule II controlled substance,

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C).

COUNT TWENTY-FIVE
Title 18, United States Code, Section 922(g)(1)
Possession of a Firearm by a Convicted Felon

On or about August 28, 2024, in the Southern District of Texas, defendant, **DENZEL CURTIS DWAYNE PINK**, knowing that he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess at least one of the following firearms, to wit:

- a. a loaded Cugir Arms 7.62 mm firearm, serial number A015441953;
- b. a loaded Tristar 12 gauge rifle, serial number KRC002317;

and said firearms having been shipped and transported in interstate and foreign commerce,

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

NOTICE OF CRIMINAL FORFEITURE
[21 U.S.C. § 853(a)]

Pursuant to Title 21, United States Code, Section 853(a), as a result of the commission of a violation of Title 21, United States Code, Sections 846 and 841(a)(1), 841(b)(1)(A), 841(b)(1)(B), and 841(b)(1)(C), as alleged in Counts One, Two, Five, Nine, Ten, Fourteen, Fifteen, Sixteen, Nineteen, Twenty-Two, and Twenty-Four of the Indictment, notice is given to the defendants,

ALFRED JACOBY GREEN,

a/k/a “Coby,”

KELVIN GEORADE JACKSON,

DEANDRE MARQUEL FIZER,

a/k/a “Dre,”

JONATHAN ROSS SIUM,

ALEXUS MONIQUE HATCHETT,

SHAWANDA JOHNSON-SMITH,

JESSICA FERGUSON,

ELBERT JACKSON,

TRAMAINA LAVON BATISTE,

and

DENZEL CURTIS DWAYNE PINK

that the following is subject to forfeiture: (1) all property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such violation; and (2) all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation. The allegations contained in Counts One, Two, Five, Nine, Ten, Fourteen, Fifteen,

Sixteen, Nineteen, Twenty-Two, and Twenty-Four of this Indictment are realleged and incorporated by reference for the purpose of alleging a forfeiture pursuant to the provisions of Title 21, United States Code, Section 853.

Upon conviction of the controlled substance offenses alleged in these Counts, each defendant shall forfeit to the United States such property, including but not limited to:

- A) \$100,940 in U.S. Currency seized on or about March 18, 2024, at the Bush Intercontinental Airport in Houston, Texas;
- B) \$17,526 in U.S. Currency seized on or about April 17, 2024, at 2130 Abiding Grace Drive;
- C) Miscellaneous Jewelry seized on or about April 17, 2024, at 2130 Abiding Grace Drive;
- D) Glock 43, bearing serial number AHPF779, seized on or about May 8, 2024, at 5907 W Airport Drive;
- E) Smith and Wesson Bodyguard, .380 caliber, bearing serial number KBJ1920, seized on or about May 8, 2024, at 5907 W Airport Drive;
- F) \$31,103 in U.S. Currency seized on or about July 16, 2024, at the Bush Intercontinental Airport in Houston, Texas;
- G) \$12,334 in U.S. Currency seized on or about August 28, 2024, at 4820 Techniplex Drive; and
- H) \$23,650 in U.S. Currency seized on or about August 28, 2024, at 12900 Shadow Creek Parkway;

NOTICE OF CRIMINAL FORFEITURE

[18 U.S.C. § 924(d); 28 U.S.C. § 2461(c)]

Pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), as a result of the commission of a violation of Title 18, United States Code, Sections 922 and 924 as alleged in Counts Three, Four, Six, Seven, Eight, Eleven, Twelve, Thirteen, Seventeen, Eighteen, Twenty, Twenty-One, Twenty-Three, and Twenty-Five of the Indictment, notice is given to the defendants,

ALFRED JACOBY GREEN, a/k/a “Coby,”

KELVIN GEORADE JACKSON,

DEANDRE MARQUEL FIZER, a/k/a “Dre,”

ELBERT JACKSON,

and

DENZEL CURTIS DWAYNE PINK,

that all firearms and ammunition involved in or used in the commission of such violations are subject to forfeiture. The allegations contained in Counts Three, Four, Six, Seven, Eight, Eleven, Twelve, Thirteen, Seventeen, Eighteen, Twenty, Twenty-One, Twenty-Three, and Twenty-Five are re-alleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c).

Upon conviction of the firearms offenses alleged in these Counts, each defendant shall forfeit to the United States such property including, but not limited to:

- A) Glock 17 9mm pistol, bearing serial number BEYA797 seized on or about March 29, 2024;
- B) Hi-Point, .40 caliber handgun, bearing serial number X7287275 seized on or about April 10, 2024;
- C) Desert Eagle .50 caliber pistol, bearing serial number DK0010640 seized on or about April 17, 2024;
- D) M&P Shield 9mm pistol, bearing serial number N HLL8317 seized on or about April 17, 2024;
- E) JTS 12-gauge shotgun, bearing serial number MK2016913 seized on or about April 17, 2024;
- F) Palmetto State Armory 556 pistol, bearing serial number 806822 seized on or about April 17, 2024;
- G) Springfield Armory 1911 .45 caliber pistol, bearing serial number P197288 seized on or about April 17, 2024;
- H) FN 5.7 pistol, bearing serial number 386409950 seized on or about April 17, 2024;
- I) Glock 23 Gen 4 pistol, bearing serial number BHGX622 seized on or about April 17, 2024;
- J) Ruger Prescott 5.7 pistol, bearing serial number 641-56433 seized on or about April 17, 2024;
- K) Palmetto State Armory 556 pistol, bearing serial number 806223 seized on or about April 17, 2024;
- L) Springfield Armory XDE .45 ACP pistol, bearing serial number HE109936 seized on or about April 17, 2024;
- M) Ruger LCP pistol, bearing serial number 372282232 seized on or about April 17, 2024;
- N) Omega shotgun, bearing serial number 20AR-1272 seized on or about April 18, 2024;

- O) Heritage Rough Rider Revolver, bearing serial number 1BH872266 seized on or about April 18, 2024;
- P) FN 5.7 pistol, bearing serial number 386385221 seized on or about April 18, 2024;
- Q) Maverick Arms Model 88, bearing serial number MV0995190 seized on or about April 18, 2024;
- R) MasterPiece Arms 9mm, bearing serial number FX26306 seized on or about April 18, 2024;
- S) CZ Scorpion EVO 351, bearing serial number E100823 seized on or about April 18, 2024;
- T) Ruger pistol, bearing serial number 371675451, seized on or about August 28, 2024;
- U) Glock 17, bearing serial number DUGP151, seized on or about August 28, 2024;
- V) Glock 43x, bearing serial number BMHX652, seized on or about August 28, 2024;
- W) Tristar Compact Shotgun, bearing serial number KRC002317, seized on or about August 28, 2024;
- X) Cugir Arms 7.62mm, bearing serial number A015441953, seized on or about August 28, 2024; and
- Y) Silver Taurus Revolver, .38 Special, bearing serial number ADK854948, seized on or about August 28, 2024;

All in accordance with Title 18, United States Code, Section 924(d); Title 21, United States Code, Section 853; Title 28, United States Code, Section 2461(c); and Rule 32.2(a) of the Federal Rules of Criminal Procedure.

MONEY JUDGMENT

Defendants are notified that, upon conviction, a monetary judgment may be imposed equal to the total value of the property subject to forfeiture and proceeds obtained, directly or indirectly, as a result of each defendant's participation in the offenses.

SUBSTITUTE ASSETS

Defendants are notified that in the event that property subject to forfeiture, as a result of any act or omission any defendant,

- (A) cannot be located upon the exercise of due diligence;
- (B) has been transferred or sold to, or deposited with, a third party;
- (C) has been placed beyond the jurisdiction of the court;
- (D) has been substantially diminished in value; or

(E) has been commingled with other property that cannot be divided without difficulty, it is the intent of the United States to seek forfeiture of any other property of the defendant up to the total value of such property pursuant to Title 21, United States Code, Section 853(p), incorporated by reference in Title 28, United States Code, Section 2461(c).

A TRUE BILL

Original Signature on File

GRAND JURY FOREPERSON

ALAMDAR S. HAMDANI
United States Attorney
Southern District of Texas

Anh-Khoa Tran
ANH-KHOA TRAN
Assistant United States Attorney

DAVID L. JAFFE
Chief, Violent Crime and Racketeering Section
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AMY L. Schwartz
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